

Docket No.: 25-cv-03679-NCM-CLP

**INITIAL CONFERENCE QUESTIONNAIRE**

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: 10/17/2025
2. If additional interrogatories beyond the 25 permitted under the federal rules are needed, the maximum number of: plaintiff(s) NA and defendant(s) N/A
3. Number of depositions by plaintiff(s) of: 4 parties, 6 non-parties
4. Number of depositions by defendant(s) of: 1 party, 7 non-parties
5. Date for completion of factual discovery: 5/1/2026
6. Number of expert witnesses of plaintiff(s): 0 medical 0 non-medical  
Date for expert report(s): N/A
7. Number of expert witnesses of defendant(s): 0 medical 0 non-medical  
Date for expert report(s): N/A
8. Date for completion of expert discovery: N/A
9. Time for amendment of the pleadings by plaintiff(s) or by defendant(s): 2/6/2026
10. Number of proposed additional parties to be joined by plaintiff(s): UNKNOWN AT THIS TIME; and by defendant(s): UNKNOWN AT THIS TIME; and time for completion of joinder: 2/6/2026
11. Types of contemplated dispositive motions:  
  
Defendants Tivoli Bi and Stellar Management will file a motion for judgment on the pleadings on Article III standing (pre-motion letter already filed)  
  
Defendants Kevin Cullen and Cullen & Associates, P.C. intend to join the motion of the other Defendants  
  
plaintiff(s): summary judgment after close of discovery (by 8/14/26)  
defendant(s): summary judgment after close of discovery (by 8/14/26)
12. Dates for filing contemplated dispositive motions: plaintiff(s) MSJ: 8/14/2026;  
defendant(s) MSJ: 8/14/2026  
Defendants (MJP): after ruling on 9/29/25 letter for pre-motion conference
13. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. Yes. Emails and other electronic docs need to be produced in their native formats, as well as in PDF or hard copy.

14. Have counsel reached any agreements regarding disclosure of experts' work papers (including drafts) and communications with experts? If so, please describe at the initial conference. N/A
15. Will the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. '636(c)? (Answer no if any party declines to consent without indicating which party has declined.)  
Yes ☐ No ☒

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\* The fillable consent form may be found at <https://img.nyed.uscourts.gov/files/forms/MJConsentForm.pdf> and may be filed electronically upon completion prior to the initial conference, or, brought to the initial conference and presented to the Court for processing.